## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

| SAM'S WINES & LIQUORS, INC.,        | )  |
|-------------------------------------|--|
| Plaintiff,                          | ) Case No. 08 C 0570   |
| v. SEAN HARTIG and PLINIO GROUP LLC | <ul><li>) Hon. John W. Darrah</li><li>) United States District Court Judge</li></ul> |
| (d/b/a Italian Wine Merchants),     | <ul><li>) Hon. Susan E. Cox</li><li>) United States Magistrate Judge</li></ul>       |
| Defendants.                         | )  |

## AGREED MOTION FOR EXTENSION OF TIME FOR DEFENDANTS TO FILE RESPONSIVE PLEADING

By agreement of the parties, Defendants Plinio Group LLC and Sean Hartig respectfully move this Court for a 30-day extension of time in which to answer or otherwise serve a responsive pleading in the above-captioned action. In support of this motion, Defendants state as follows:

- 1. On January 25, 2008, Plaintiff Sam's Wines & Liquors, Inc. filed this action against Defendants.
- 2. Process was served on Defendants on January 28, 2008. On February 15, 2008, Defendants moved for an extension of time until March 4, 2008, to serve an answer or responsive pleading. By order dated February 18, 2008, that motion was granted by this Court.
- 3. Defendants have proposed that the Parties discuss the exchange of certain information relating to the allegations in the Complaint. To facilitate those discussions, Defendants requested an extension of time until April 3, 2008, for Defendants to answer or otherwise respond to the Complaint. Plaintiff agreed to this request.

WHEREFORE, Defendants Plinio Group LLC and Sean Hartig respectfully move this Court for a 30-day extension of time in which to answer or otherwise serve a responsive pleading, up to and including April 3, 2008. The Parties further request that the pending status date of March 26, 2008, be continued until April 3, 2008, if the Court is available on such date.

Dated: March 4, 2008

Respectfully submitted,

/s/ Paul J. Ferak

Francis A. Citera (ARDC # 6185263) Paul J. Ferak (ARDC # 6272208) Greenberg Traurig, LLP 77 West Wacker Drive, Suite 2500 Chicago, Illinois 60601

Tel: (312) 456-8400 Fax: (312) 456-8435

Attorneys for Plinio Group LLC and Sean Hartig